

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT NEW YORK

IN RE: EX PARTE APPLICATION OF  
EURASIAN NATURAL RESOURCES  
CORPORATION LIMITED PURSUANT TO 28  
U.S.C. § 1782 FOR LEAVE TO TAKE  
DISCOVERY FOR USE IN FOREIGN  
PROCEEDINGS

x

Case No. 1:20-mc-00312-ER

Hon. Edgardo Ramos

Applicant.

x

**DECLARATION OF BETH SILFIN IN SUPPORT OF RESPONDENT  
HARPERCOLLINS PUBLISHERS, LLC'S MOTION TO QUASH SUBPOENA OR,  
IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER**

I, Beth Silfin, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney at law duly licensed to practice before this Court. I am Vice President, Deputy General Counsel at HarperCollins Publishers, LLC (“HarperCollins US”), the Respondent in the above-captioned matter. I submit this declaration in support of HarperCollins US’ Motion to Quash Subpoena or, in the Alternative, for a Protective Order.

2. HarperCollins UK is a London-based, independently incorporated, foreign affiliate and sister company of HarperCollins US.

3. Upon information and belief, HarperCollins UK published Tom Burgis’s *Kleptopia: How Dirty Money Is Conquering the World* (hereinafter, “the Book”) on September 3, 2020. HarperCollins US published the Book on September 8, 2020. The Book received wide international acclaim.

4. Documents concerning any compensation paid to Mr. Burgis by HarperCollins US are proprietary and commercial documents to HarperCollins US.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 23, 2020  
New York, NY

  
Beth Silfin

RECEIVED - U.S. DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

EXCEMPTIONS TO DISCLOSURE REQUIREMENTS  
AND FORWADED COPIES OF PLEADING AND EXHIBITS  
PENDING DECISION OF THIS MOTION TO DISMISS

Plaintiff respectfully submits the following in accordance with

Section 23.1(a) of the Federal Rules of Civil Procedure ("FRCP") and  
in accordance with the Standing Order of this Court, dated January 20, 2016,  
entitling "Order Regarding Standing Orders of the Court, and Standard of Practice  
and Procedure in Civil Actions," which provides that "[t]he parties may file documents  
electronically or by paper copy, and the Court may accept either type of filing, at its discretion." (See also, Order dated April 1, 2016, re: Standing Order of the Court, and Standard of Practice and Procedure in Civil Actions, which provides that "[t]he parties may file documents electronically or by paper copy, and the Court may accept either type of filing, at its discretion.")

Plaintiff hereby certifies that the foregoing document is being filed electronically through the CM/ECF system, and that a copy of the same has been provided to all other parties of record. Plaintiff further certifies that the foregoing document is being filed by paper copy, and that a copy of the same has been provided to all other parties of record.

Plaintiff certifies that the foregoing document contains no confidential information, and that it is being filed in accordance with the Standing Order of the Court, and Standard of Practice and Procedure in Civil Actions.